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13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 UNITED STATES OF AMERICA, ) NO. CR 21-00192 WHO  
17 Plaintiff, ) MOTION TO UNSEAL  
18 v. )  
19 WILLIAM GILMARTIN, III, )  
20 Defendant. )

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21 On May 27, 2021, defendant William GILMARTIN pled guilty before this Court to a one-count  
22 Information charging him with Conspiracy to Commit Honest Services Wire Fraud. *Dkt 39, 40.* At the  
23 request of the government, Exhibit A of the Plea Agreement, containing the factual basis for the plea,  
24 was filed under seal because at the time the government's investigation of the facts underlying defendant  
25 GILMARTIN's conduct was ongoing. There is no longer an investigative need by the government to  
26 keep defendant GILMARTIN's factual admissions in Exhibit A under seal. The undersigned Assistant  
27 U.S. Attorney consulted with counsel for defendant GILMARTIN, who has no objection to unsealing  
Exhibit A to the Plea Agreement.

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1 Therefore, the government respectfully requests that this Court order that Exhibit A to defendant  
2 GILMARTIN's plea agreement be unsealed.

**THOMAS A. COLTHURST**  
Attorney for the United States

Dated: June 7, 2023

/s/ David J. Ward  
DAVID J. WARD  
Assistant United States Attorney

For good cause shown, it is **SO ORDERED.**

Dated:

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**HONORABLE WILLIAM H. ORRICK**  
United States District Court Judge